

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SECURITIES AND EXCHANGE)	Civil Action No: 15-cv-05843-JCJ
COMMISSION,)	
)	
Plaintiff,)	
)	
v.)	
)	
SUMMIT TRUST COMPANY,)	
RAMPART CAPITAL MANAGEMENT,)	
LLC, TRUST COUNSELORS)	
NETWORK, INC., BROWN)	
INVESTMENT ADVISORS, INC.)	
KEVIN C. BROWN, and GEORGE P.)	
BROWN,)	
)	
Defendants,)	
)	
and)	
)	
RAMPART FUND LP, WEALTH)	
MAINTENANCE ORGANIZATION,)	
LLC, and HODDINOTT FARM)	
DEVELOPMENT, LLC,)	
)	
Relief Defendants.)	

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S UNOPPOSED MOTION
FOR AN ORDER TERMINATING THE RECEIVERSHIP, DISCHARGING THE
RECEIVER AND FOR OTHER RELIEF**

The Securities and Exchange Commission (“Commission” or “SEC”), respectfully submits this Unopposed Motion for an Order Terminating the Receivership, Discharging the Receiver and for other Relief, specifically instructing the Receiver, Ricardo J. Zayas, to produce a final accounting and to turnover all of the assets (after paying the final Court approved fees and expenses of the Receiver and its counsel) on hand to the SEC. This motion is supported by the

Commission's Memorandum of Law. The Receiver consents to the relief requested, as set forth in the proposed Order.

Dated: January 28, 2021

Respectfully submitted,

s/Stephen C. McKenna

Stephen C. McKenna

Michael J. Roessner

Attorneys for Plaintiff

United States Securities and Exchange Commission

100 F Street, N.E., Mail Stop 5631

Washington, D.C. 20549

Tel: (303) 844-1036

Fax: (303) 297-3529

Email: mckennas@SEC.gov

roessnerm@sec.gov

CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2021, I electronically filed the foregoing Unopposed Motion with the Clerk of Court using the CM/ECF system.

Natalie Ramsey, Esq
MONTGOMERY, MCCracken,
WALKER & RHOADS, LLP
123 South Broad Street
Philadelphia, PA 19109
215-772-1500

Email: nramsey@mmwr.com

Counsel for Ricardo J. Zayas, Receiver for The Receivership Estates of Defendant Summit Trust Company and Trust Counselors Network, Inc. and Relief Defendant Rampart Fund LP

Ricardo J. Zayas MARCUM LLP
1600 Market Street, 32nd Floor
Philadelphia, PA 19103
215-297-2320

Email: ricardo.zayas@marcumllp.com

Receiver for The Receivership Estates of Defendants Summit Trust Company and Trust Counselors Network, Inc. and Relief Defendant Rampart Fund LP

Kevin C. Brown
1904 Hilltown Pike
Hilltown, PA 18927

Email: kevin@secondhalfllc.com

Authorized Representative of Defendants Rampart Capital Management, LLC and Brown Investment Advisors, Inc. and Relief Defendant Hoddinott Farm Development, LLC

George P. Brown
13 Langhorne Road
Chalfont, PA 18914

Email: Georgepbrown201@gmail.com

Authorized Representative of Defendants Rampart Capital Management, LLC and Brown Investment Advisors, Inc. and Relief Defendant Wealth Maintenance Organization, LLC

/s/ Scott Wesley

Contract Paralegal